

ALAN D. LEVINE

ATTORNEY AT LAW

80-02 KEW GARDENS ROAD

KEW GARDENS, NEW YORK 11415

ALAN D. LEVINE

SUSANNE RAMKISHUN

(718) 793-6363

FAX: (718) 520-8751

E-MAIL: alandlaw@justice.com

June 19, 2014

**VIA ECF**

Honorable Ramon E. Reyes, Jr.  
United States Magistrate Judge  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Martin, et ano. v. Behan, et al.  
13 CV 1534 (ILG) (RER)

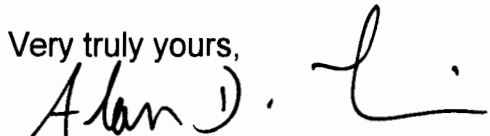
Dear Judge Reyes:

I am the attorney for the plaintiffs in the above-referenced action. The present discovery deadline in the action is June 20, 2014. I am writing, on behalf of all the parties to the action, to request a 120-day extension of all deadlines in the action. The reasons for this request are that (a) the parties have not yet been able to obtain the tapes or transcripts of the disciplinary proceeding brought against defendant Goris and (b) the police commissioner has not yet acted on the trial commissioner's recommendations made after the administrative trial. Consequently, evidence that is vital to both the plaintiff's and defendants' cases has still not been obtained by any of the parties.

Since the last conference in court, the parties have exchanged all available written documents. However, because of the unavailability of the trial room transcripts, no depositions have yet been taken in the action. The parties believe that the tapes and/or transcripts will be provided in the very near future, thereby enabling discovery to

proceed, thus enabling all pre-trial proceedings to be completed within the 120 additional days requested.

Very truly yours,



ALAN D. LEVINE

ADL/mp

cc: Carolyn Depoian, Esq.  
John W. Burns, Esq.